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Attorneys for Defendants,  
GREYSTONE NEVADA, LLC;  
LENNAR SALES CORP.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

PETER J. HELLMAN,  
Plaintiff,

vs.

GREYSTONE NEVADA, LLC.;  
LENNAR SALES CORP.; DOES 1  
through X; and ROE CORPORATIONS  
XI through XXXI, inclusive,

Defendants.

CASE NO.: 2:20-cv-00559-JCM-BNW

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DISCOVERY  
DEADLINES**

**[SECOND REQUEST]**

Defendants GREYSTONE NEVADA, LLC and LENNAR SALES CORP.  
(collectively "Defendants"), by and through their counsel of record, Amtoj S. Randhawa,  
Esq. of the law firm of Newmeyer & Dillion LLP, and Plaintiff PETER J. HELLMAN  
("Plaintiff"), by and through his counsel of record, John B. Greene, Esq. of Vannah &  
Vannah, HEREBY STIPULATE pursuant to LR IA 6-1, and request the Court to extend all  
remaining discovery deadlines by 120 days, as set forth herein.

These extensions are requested in light of the difficulties the parties have faced in  
conducting discovery given: (1) the ongoing COVID-19 pandemic, (2) the business and  
administrative disruptions caused by same, and (3) Defendants' counsel's recent infection  
with the COVID-19 virus. As a result, Defendants' counsel is unable to participate in

multiple upcoming depositions (as set forth below), and Defendants' counsel is unable to comply with the current court-ordered deadlines. Defendants' counsel is praying for a speedy and healthy recovery, but as this Court is aware, there is no definitive time frame as to when that might occur.

Good cause exists to grant the relief requested herein given that Defendants' counsel is currently recovering from the COVID-19 virus, and as a result, the parties' are unable to complete the necessary depositions and discovery before the December 28, 2020 deadline to exchange expert witness information. The parties have been working diligently to conduct discovery, and as of the date of this stipulation, the parties have served and exchange responses to special interrogatories and requests for production of documents, and the parties had scheduled the following depositions within the upcoming days:

- (1) December 1, 2020: Deposition of Amanda Hellman;
- (2) December 3, 2020: Deposition of Plaintiff;
- (3) December 7, 2020: Deposition of Tom Dome;
- (4) December 7, 2020: Deposition of FRCP 30(b)(6) witness for Greystone Nevada, LLC;
- (5) December 8, 2020: Deposition of Melissa Flores; and
- (6) December 8, 2020: Deposition of FRCP 30(b)(6) witness for Lennar Sales Corp.

However, in light of Defendants' counsel's inability to appear for these depositions, and general unavailability for the near future, these depositions have been vacated and will be rescheduled for another date once Defendants' counsel has recovered and is able to return to work.

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In light of the circumstances set forth above, the parties hereby stipulate and request to continue the dates set forth in the Court's Scheduling Order (ECF 13) as follows:

1. That the discovery cut-off be extended from **February 26, 2021 to June 28, 2021;**

2. That the time for parties to file any motions to amend the pleadings to add parties be extended from **November 27, 2020 to March 29, 2021;**

3. That the disclosure of experts and their reports shall be extended from **December 28, 2020 to April 27, 2021;**

4. The disclosure of rebuttal experts and their reports shall be extended from **January 26, 2021 to May 26, 2021;**

5. That the time for parties to file Dispositive Motions shall be extended from **March 28, 2021 to July 26, 2021;**

6. That the time for parties to prepare a Consolidated Pre-Trial Order shall be extended from **April 29, 2021 to August 27, 2021; and**

7. That the time for parties to stipulate or move to extend the discovery cutoff be extended from **February 2, 2021 to June 2, 2021.**

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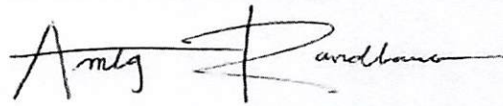
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1 Dated: this 30<sup>th</sup> day of November, 2020 NEWMEYER & DILLION LLP


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3 By:

  
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6 Attorneys for Defendants GREYSTONE  
7 NEVADA, LLC; LENNAR SALES CORP.

8 Dated: this 30<sup>th</sup> day of November, 2020 VANNAH & VANNAH

9  
10 By:

  
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13 Attorneys for Plaintiff PETER J. HELLMAN

14 ORDER

15 IT IS SO ORDERED

16 DATED: 1:37 pm, December 04, 2020

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19 BRENDA WEKSLER  
20 UNITED STATES MAGISTRATE JUDGE  
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